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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

BRAYDEN STARK, JUDD OOSTYEN,
ISAAC BELENKIY, VALERIE BURTON,
LAURA GOODFIELD, and DENOVIAS
MACK, individually and on behalf of all others
similarly situated,

Case No. 3:22-cv-03131-JCS

JOINT NOTICE REGARDING CLASS ACTION SETTLEMENT

Plaintiffs,

V.

PATREON, INC.

Defendant.

1 Plaintiffs Brayden Stark, Judd Oostyen, Isaac Belenkiy, Valerie Burton, Laura Goodfield, and
 2 Denovias Mack (“Plaintiffs”) and Defendant Patreon, Inc. (“Patreon”), hereby respectfully notify the
 3 Court of recent developments related to the class action Settlement in this case, as set forth below:

4 **Background:**

5 On August 2, 2024, Plaintiffs filed their motion for preliminary approval of the class action
 6 Settlement in this case. *See* ECF No. 176. Plaintiffs’ motion stated that (1) Patreon’s records indicate
 7 that “approximately 6 million Patreon account holders accessed video content on patreon.com while in
 8 the United States during the Class Period.” *Id.* at 12. Plaintiffs’ motion further stated that, based on
 9 information provided by the parties, the Claims Administrator (Simpluris, Inc.) “anticipates notice and
 10 administration expenses in the range of \$300,000-\$350,000.” *Id.* at 8.

11 On September 23, 2024, the Court granted preliminary approval of the class action Settlement
 12 and appointed Simpluris to serve as the Claims Administrator. *See* ECF No. 192.

13 **Developments**

14 On October 4, 2024, pursuant to section 6.1 of the Settlement Agreement (*see* ECF No. 176-1),
 15 Patreon provided Simpluris with the names and email addresses that Patreon has for all potential class
 16 Members (the “Potential Class List”). The Potential Class List contains information for a total of
 17 8,653,241 Patreon account holders, of which, Simpluris has indicated, 8,168,662 have valid email
 18 addresses and will receive direct Notice of the Settlement.

19 The increase – from the “approximately 6 million” figure to the 8-million figures discussed
 20 above – is due to limitations in Patreon’s records associated with the time periods when the Meta Pixel
 21 was operative on its website, and the parties wish to give notice to the broadest potential group of Class
 22 members.

23 Based on the 8,168,662 figure, Simpluris has provided a revised not-to-exceed estimate of
 24 \$425,000, to perform notice and administration for the Settlement.

25 Plaintiffs and Patreon each continue to believe that the Settlement is fair, reasonable, and
 26 adequate for the Class.

27 Plaintiffs will arrange to have the Claims Administrator post this Notice on the Settlement
 28 Website.

1 Dated: October 13, 2024

Respectfully submitted,

2 By: /s/ Simon S. Grille
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17 Dated: October 13, 2024

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30 *PATREON, INC.*

ATTESTATION

I, Simon Grille, am the ECF User whose ID and password are being used to file this document.

In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

Dated: October 13, 2024

/s/ Simon Grille

Simon Grille